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May 4, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into the Treatment of Network Upgrade Costs for Qualifying
Facilities.
Docket No. UM 2032

Dear Filing Center:

Please find enclosed the Comments of the Alliance of Western Energy Consumers
in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate
to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	COMMENTS OF THE ALLIANCE OF
OREGON,)	WESTERN ENERGY CONSUMERS
)	
Investigation into the Treatment of Network)	
Upgrade Costs for Qualifying Facilities.)	
_____)	

I. INTRODUCTION

In accordance with the Amended Staff Proposed Issues List filed by the Staff of the Public Utilities Commission of Oregon (“Staff”) on April 28, 2020, the Alliance of Western Energy Consumers (“AWEC”) submits these comments in the above-referenced docket. AWEC appreciates the opportunity to participate in the Commission’s process and to file these comments regarding the status of the Commission’s Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities.

I. DISCUSSION

AWEC agrees with Staff’s recommendation to limit the initial phase (“Phase I”) of Docket No. UM 2032 to the following two issues:

1. Who should be required to pay for Network Upgrades necessary to interconnect the QF to the host utility?
2. Should on-system QFs be required to interconnect to the host utility with Network Resource Interconnection Service (NRIS) or should QFs have the option to interconnect with Energy

Resource Interconnection Service (ERIS) or an interconnection service similar to ERIS?^{1/}

AWEC further agrees with Staff that a second phase may be necessary depending on the outcome of Phase I in order to address issue three:

3. If the answer to Issue No. 1 is that users and beneficiaries of Network Upgrades, (which typically are primarily utility customers), should pay for the Network Upgrades necessary to interconnect the QF to the host utility, how should that policy be implemented? For example, should utility customers, and other beneficiaries and/or users, fund the cost of the Network Upgrades upfront or should the QF provide the funding for the Network Upgrade subject to reimbursement from utility customers? Should the QF, utility customers, and other beneficiaries and users, if any, share the costs of Network Upgrades?^{2/}

Limiting Docket No. UM 2032 to issues listed in Phase I, and potentially Phase II, supports a streamlined and administratively efficient process. Issue one and two are primarily legal and policy questions in nature, the outcome of which may affect the cost responsibility of customers who purchase power from PacifiCorp and Portland General Electric.

Finally, AWEC agrees with Staff that the four issues identified by the Renewable Energy Coalition (“REC”), the Community Renewable Energy Association (“CREA”), and other intervenors are better suited for a separate docket. The four issues are as follows:

1. What are the appropriate circumstances under which an Interconnection Customer should be provided an option to build (or hire third parties to build) Network Upgrades?

^{1/} Docket No. UM 2032, Amended Staff Proposed Issues List, at 2:6-9 (April 28, 2020).

^{2/} Id. at 2:13-17.

2. What are the appropriate circumstances under which an Interconnection Customer should have an opportunity to hire third parties to perform Interconnection Studies?
3. What is the appropriate process through which an Interconnection Customer may challenge utility cost estimates and propose alternatives?
4. In what circumstances should identified transmission upgrades be reviewed using power flow analysis to confirm that the upgrades are necessary and prudently designed and sized?^{3/}

Unlike the three proposed issues in Phases 1 and 2, these issues appear primarily factual in nature, and their cost impact, if any, on retail utility customers is more indirect and uncertain. AWEC would be unlikely participate in a process addressing these questions. As such, these issues are better addressed in a separate docket.

Dated this 4th day of May, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Milinovich

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^{3/} Id. at 2:22-3:8.